



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 24, 2020

By Email and ECF

James M. Branden
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Geoffrey R. Kaiser
Todd D. Greenberg
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. As with the government's prior productions, this material can be obtained by contacting John Palermo at DupeCoop at 973-895-1359. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, and October 16, 2020. The government renews its request for reciprocal discovery from the defendants.

Specifically, enclosed please find the following materials, which are subject to the protective order entered in this case on May 29, 2020:

Records	Bates Number
Data seized from 48 Mall Drive, Commack, New York, pursuant to the judicially-authorized search warrant produced to you at AVENTURA_0000080243 to AVENTURA_0000080254	AVTESI_0000986476-AVTESI_0002365415
Data from Microsoft Corporation obtained pursuant to the judicially-authorized search warrants produced to you at AVENTURA_0000080277 to AVENTURA_0000080287	AVTESI_0002365416-AVTESI_0003374422

The data consists of load files containing native, text and TIFF files.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
Ian C. Richardson
Alexander Mindlin
Kayla Bensing
Assistant U.S. Attorneys
(718) 254-6299/6433/6279

Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)